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Attorney for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON**

UNITED STATES OF AMERICA,

No. 3:21-mj-00093-1

Plaintiff,

v.

**DEFENDANT'S UNOPPOSED
MOTION TO CONTINUE
ARRAIGNMENT**

JORGE ROSALES,

Defendant.

Jorge Rosales, through counsel, Francesca Freccero, hereby moves to continue the arraignment in this case currently set for May 21, 2021, for approximately two weeks until June 4, 2021. The government, through AUSA Gary Sussman, does not object. The grounds for the motion are set out, below.

Undersigned counsel anticipates that the federal grand jury will return an Indictment in this case soon. However, the arraignment is only two days away and the Indictment is not yet available to review with Mr. Rosales to prepare for arraignment. Undersigned counsel also will be mostly unavailable during jail meeting times between the time of this motion and the time currently set for arraignment, so review before the arraignment time may be difficult to achieve. In addition, with the postponement of the arraignment date and adequate time to review the Indictment, Mr. Rosales may choose to waive arraignment altogether, which will avoid the need for him to be transported in custody and will save this court's time and resources.

Undersigned counsel explained to Mr. Rosales his right to a speedy arraignment. He understands that right and waives it to the extent necessary to accommodate the instant motion.

Respectfully submitted on May 19, 2021.

/s/ Francesca Freccero
Francesca Freccero
Assistant Federal Public Defender